

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-CV-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

PLAINTIFFS' REQUESTS FOR ADMISSION TO DEFENDANT LLANO COUNTY,
SET ONE

PROPOUNDING PARTY: Plaintiffs Leila Green Little et al.

RESPONDING PARTY: Defendant Llano County

SET NUMBER: One (1)

Pursuant to Fed. R. Civ. P. 36, Plaintiffs hereby requests that Defendant Llano County (“Defendant” or “Llano County”) answer the following Requests for Admission and that said answers be served on Plaintiffs at the law offices of BraunHagey & Borden LLP, 351 California Street, 10th Floor, San Francisco, California 94104 or Wittliff Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701, within fourteen (14) days of the Court’s Order re Plaintiffs’ Motion for Expedited Discovery.

These requests are continuing in nature and require supplemental responses as provided by Rule 26 of the Federal Rules of Civil Procedure, in the event counsel for Llano County, or anyone representing the interests of Llano County, becomes aware of any additional information, documents, or things sought by these requests between the time Llano County responds and trial.

DEFINITIONS

1. The term “PLAINTIFFS” refers, collectively and individually, to Leila Green Little, Jeanne Puryear, Kathy Kennedy, Rebecca Jones, Richard Day, Cynthia Waring, and Diane Moster.
2. The terms “YOU,” “YOUR,” and “LLANO COUNTY” refer, collectively and individually, to Llano County and its officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under its control or on its behalf.
3. The term “DEFENDANTS” refers, collectively and individually, to Llano County, Ron Cunningham, Jerry Don Moss, Peter Jones, Mike Sandoval, Linda Raschke, Amber Milum, Bonnie Wallace, Rochelle Wells, Rhonda Schneider, and Gay Baskin, and their officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under their control or on their behalf.

4. The term “LIBRARY BOARD” refers, collectively and individually to, DEFENDANT Gay Baskin, Susie Sitton, Cindy Travers, Cheryll Mabray, Ravelle Kundinger, Nancy Miller, Sharon Maki, Louann Raley, DEFENDANT Rochelle Wells, DEFENDANT Rhonda Schneider, Anita Hilton, Robyn Tibbs, and DEFENDANT Bonnie Wallace, and their officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under their control or on their behalf.

5. The term “LIBRARY SYSTEM” refers, collectively and individually, to the Llano Library, the Kingsland Library, and the Lakeshore Library, and their collective and individual collections of physical, audio, and electronic books and materials.

6. The term “OVERDRIVE” refers to the online platform used to access the LIBRARY SYSTEM’s electronic collection or catalog of materials, including ebooks, audio books, movies, and research databases.

7. The term “KRAUSE LIST” refers to the list of purportedly inappropriate books compiled and published by Texas State Representative Matt Krause on October 25, 2021.

8. The term “COLLECTION REVIEW COMMITTEE” refers to the internal committee created by the LIBRARY BOARD for the review of books in the LIBRARY SYSTEM.

9. “SEXUAL CONTENT” refers to any material that refers to, reflects, or depicts sexual activity in any fashion.

10. The term “MATERIALS” refers to physical books, including but not limited to printed books in prose, picture books, and graphic novels and memoirs, as well as digital books, including but not limited to ebooks and audiobooks.

11. The term “INAPPROPRIATE CONTENT” refers to material that DEFENDANTS allege is indecent, pornographic, obscene, or otherwise inappropriate due to profanity or discussion of critical race theory (or “CRT”), gender identity, sex, nudity, sexuality, teen pregnancy, violence, or LGBTQ issues.

12. The term “COMMUNICATIONS” refers to the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) whether orally, in writing, or otherwise, and whether in the form of emails, messages, text messages, chat logs, letters, envelopes, telegrams, social media posts or direct messages, or otherwise.

13. The term “DOCUMENT” is used in the broadest possible sense, and means, without limitation, any written, printed, typed, photostatic, photographed, recorded or otherwise reproduced COMMUNICATION or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any notes, records, studies, analyses, contracts, agreements, projections, estimates, working papers, summaries, statistical statements, financial statements or work papers, accounts, analytical records, reports or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, or other reports, trade letters, press releases, comparisons, books, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, forecasts, drawings, diagrams, instructions, minutes of meetings, questionnaires, and surveys, charts, graphs, photographs, phonographs, films, videotapes, disks, data cells, drums, printouts and all other data compilations from which information can be obtained, any preliminary versions, drafts, or revisions of any kind of the foregoing, and other writings or documents of whatever description or kind, whether produced or authored by **you** or by anyone else, including non-identical copies of any of the foregoing, now in **your** possession, custody, or control.

14. The term “PERSON” refers to natural persons, corporations, firms, proprietorships, partnerships, trust, joint ventures, groups, associations, institutes, organizations, and any other business, governmental or legal entities, including any divisions, departments, and units thereof.

15. The term “IDENTIFY” means to set forth in detail a description of those facts, actions, or tangible items, including the dates, location, and any persons or entities necessary to provide detailed information concerning the relevant facts, actions, or tangible items, as well as the name of the person or entity; the person or entity’s current business address, including the

name of any entity at which a person works; and if no business address is known, state the residential address for any person identified.

16. The term “RELATED TO” means making a statement about, mentioning, referring to, discussing, describing, reflecting, evidencing, identifying, dealing with, consisting of, constituting, or in any way pertaining to the subject, in whole or in part.

17. The singular includes the plural and vice versa, except as the context may require otherwise; reference to any gender includes the other gender; the words “and” and “or” shall be construed as either conjunctive or disjunctive in such manner as will broaden as widely as possible the scope of any topic; the words “any” and “all” mean “any and all”; the words “each” and “every” mean “each and every”; and the word “including” means “including without limitation.”

INSTRUCTIONS

1. If any Request for Admission is withheld by reasons of a claim of privilege, or because it RELATES TO any DOCUMENT being withheld by reason of a claim of privilege, please furnish a privilege log within seven (7) days of service of these Requests identifying each such DOCUMENT for which privilege is claimed, together with the following information with respect to each DOCUMENT or Admission: (a) author; (b) recipient; (c) sender; (d) indicated or blind copies; (e) date; (f) general subject matter; (g) basis on which the privilege is claimed; and (h) the Request for Production to which such DOCUMENT RELATES.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that the LIBRARY SYSTEM’s 2006 Materials Policy, attached here as Exhibit A, applied to the selection of MATERIALS for, and the removal of MATERIALS from, the LIBRARY SYSTEM between June 2021 and the present.

REQUEST FOR ADMISSION NO. 2:

Admit that you violated the LIBRARY SYSTEM’s 2006 Materials Policy when YOU removed *Caste: The Origins of Our Discontent* by Isabel Wilkerson from the Library System.

REQUEST FOR ADMISSION NO. 3:

Admit there are still MATERIALS with SEXUAL CONTENT available in the LIBRARY SYSTEM.

REQUEST FOR ADMISSION NO. 4:

Admit that *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti is not pornographic or obscene.

REQUEST FOR ADMISSION NO. 5:

Admit that books with INAPPROPRIATE CONTENT and SEXUAL CONTENT can have serious literary, artistic, political, and scientific value.

REQUEST FOR ADMISSION NO. 6:

Admit that all citizens of Llano County should have access to MATERIALS on Critical Race Theory.

Dated: May 11, 2022

BRAUNHAGEY & BORDEN LLP

By: /DRAFT/
Ellen V. Leonida

Attorneys for Plaintiffs

EXHIBIT A

Materials Selection Policy

Purpose of Policy

- To guide the Director/Head Librarian in the selection of materials.
- To inform the public about the principles upon which selections are made.

Definition of Media Selection

- “Selection” refers to the decision that must be made either to add materials to the collection or retain materials already in the collection. The “de-selection” of materials will be based on information supplied in the *Crew Manual*.

Goals of Media Selection

- To maintain a well-balanced and broad collection of materials for information, reference, research, and enjoyment.
- To support the democratic process by providing materials for the education and enlightenment of the community.

Responsibility for Selection

- The ultimate responsibility for media selection rests with the Director/Head Librarian of the Library, who operates within the framework of policies determined by the Commissioners Court. The general public and staff members may recommend materials for consideration.

General Principles

- Selection is based on the merits of a work in relation to the needs, interest and demands of the Llano County Library System. Basic to this policy is the Library Bill of Rights, as adopted by the American Library Association. This states in part, “In no case should any book be excluded because of race or nationality or the political or religious views of the writer. There should be the fullest practicable provision of material presenting all points of view concerning the problem and issues of our times...international, national and local; and media or other reading material of sound factual authority should not be proscribed or removed from the library shelves because of partisan or doctrinal disapproval”. The Library does not promulgate particular beliefs or views, nor is the selection of any given media equivalent to endorsement of the viewpoint of the author expressed therein.
- Responsibility for the reading of children rests with their parents or legal guardians. Selection should not be inhibited by the possibility that media may inadvertently come into possession of children.
- Materials with an emphasis on sex, or containing profane language should not be automatically rejected. Selection should be made on the basis of whether the media presents life in its true proportions, whether characters and situations are realistically presented, and whether the media has literary value.

- Based on the services it is expected to perform, it is the responsibility of the Library to provide circulation reference, and research material for the general public and the student. Special collections in depth (business, technology, local history, etc.) shall also be maintained when indicated by accepted Library procedures and budget restraints.

Specific Principles for Selection

The following principles will condition selection:

- Contemporary significance or permanent value.
- Accuracy
- Authority of author
- Relation of work to existing collection
- Price, format and ease of use
- Scarcity of information in subject area
- Availability of material elsewhere in community... holdings of other libraries within the community is considered in developing the Library's collection.
- Popular demand... The Library should make available materials for enlightenment and recreation even if not enduring in value, interest or accuracy. A representative sampling of experimental or short-lived materials may be purchased.

Textbooks

- Providing textbooks and curriculum material is generally held to be the responsibility of the schools. Textbooks should be purchased for the collection when they supply information in areas that may be the best, or the only source of information on the subject.

Non-book Materials

- Purchase of non-book materials should be governed by the same principles and criteria applied to book purchase.

Gifts

- Selection of gifts should be governed by the same principles and criteria applied to the selection of an item for purchase. No conditions may be imposed relating to any gift after its acceptance by the Library

Requests for removal of materials

- The patron's choice of library materials for personal use will be an individual matter.
- Responsibility for the use of materials by children and adolescents shall rest with their parents or legal guardians. While a person may reject materials for himself or herself and for his or her children, he or she shall not exercise censorship to restrict access to the materials by others.

PROPOUNDING PARTY: Plaintiffs Leila Green Little et al.

RESPONDING PARTY: Defendant Jerry Don Moss

SET NUMBER: One (1)

Pursuant to Fed. R. Civ. P. 36, Plaintiffs hereby requests that Defendant Jerry Don Moss (“Defendant” or “JDM”) answer the following Requests for Admission and that said answers be served on Plaintiffs at the law offices of BraunHagey & Borden LLP, 351 California Street, 10th Floor, San Francisco, California 94104 or Wittliff Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701, within fourteen (14) days of the Court’s Order re Plaintiffs’ Motion for Expedited Discovery.

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name of any entity at which a person works; and if no business address is known, state the residential address for any person identified.

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Dated: May 11, 2022

BRAUNHAGEY & BORDEN LLP

By: /DRAFT/
Ellen V. Leonida

Attorneys for Plaintiffs

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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-CV-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

PLAINTIFFS' REQUESTS FOR ADMISSION TO DEFENDANT AMBER MILUM,
SET ONE

PROPOUNDING PARTY: Plaintiffs Leila Green Little et al.

RESPONDING PARTY: Defendant Amber Milum

SET NUMBER: One (1)

Pursuant to Fed. R. Civ. P. 36, Plaintiffs hereby requests that Defendant Amber Milum (“Defendant” or “Ms. Milum”) answer the following Requests for Admission and that said answers be served on Plaintiffs at the law offices of BraunHagey & Borden LLP, 351 California Street, 10th Floor, San Francisco, California 94104 or Wittliff Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701, within fourteen (14) days of the Court’s Order re Plaintiffs’ Motion for Expedited Discovery.

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officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under their control or on their behalf.

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14. The term “PERSON” refers to natural persons, corporations, firms, proprietorships, partnerships, trust, joint ventures, groups, associations, institutes, organizations, and any other business, governmental or legal entities, including any divisions, departments, and units thereof.

15. The term “IDENTIFY” means to set forth in detail a description of those facts, actions, or tangible items, including the dates, location, and any persons or entities necessary to provide detailed information concerning the relevant facts, actions, or tangible items, as well as the name of the person or entity; the person or entity’s current business address, including the name of any entity at which a person works; and if no business address is known, state the residential address for any person identified.

16. The term “RELATED TO” means making a statement about, mentioning, referring to, discussing, describing, reflecting, evidencing, identifying, dealing with, consisting of, constituting, or in any way pertaining to the subject, in whole or in part.

17. The singular includes the plural and vice versa, except as the context may require otherwise; reference to any gender includes the other gender; the words “and” and “or” shall be construed as either conjunctive or disjunctive in such manner as will broaden as widely as possible the scope of any topic; the words “any” and “all” mean “any and all”; the words “each” and “every” mean “each and every”; and the word “including” means “including without limitation.”

INSTRUCTIONS

1. If any Request for Admission is withheld by reasons of a claim of privilege, or because it RELATES TO any DOCUMENT being withheld by reason of a claim of privilege, please furnish a privilege log within seven (7) days of service of these Requests identifying each such DOCUMENT for which privilege is claimed, together with the following information with respect to each DOCUMENT or Admission: (a) author; (b) recipient; (c) sender; (d) indicated or blind copies; (e) date; (f) general subject matter; (g) basis on which the privilege is claimed; and (h) the Request for Production to which such DOCUMENT RELATES.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that the LIBRARY SYSTEM’s 2006 Materials Policy, attached here as Exhibit A, applied to the selection of MATERIALS for, and the removal of MATERIALS from, the LIBRARY SYSTEM between June 2021 and the present.

REQUEST FOR ADMISSION NO. 2:

Admit there are still MATERIALS with SEXUAL CONTENT available in the LIBRARY SYSTEM.

Dated: May 11, 2022

BRAUNHAGEY & BORDEN LLP

By: /DRAFT/
Ellen V. Leonida

Attorneys for Plaintiffs

EXHIBIT A

Materials Selection Policy

Purpose of Policy

- To guide the Director/Head Librarian in the selection of materials.
- To inform the public about the principles upon which selections are made.

Definition of Media Selection

- “Selection” refers to the decision that must be made either to add materials to the collection or retain materials already in the collection. The “de-selection” of materials will be based on information supplied in the *Crew Manual*.

Goals of Media Selection

- To maintain a well-balanced and broad collection of materials for information, reference, research, and enjoyment.
- To support the democratic process by providing materials for the education and enlightenment of the community.

Responsibility for Selection

- The ultimate responsibility for media selection rests with the Director/Head Librarian of the Library, who operates within the framework of policies determined by the Commissioners Court. The general public and staff members may recommend materials for consideration.

General Principles

- Selection is based on the merits of a work in relation to the needs, interest and demands of the Llano County Library System. Basic to this policy is the Library Bill of Rights, as adopted by the American Library Association. This states in part, “In no case should any book be excluded because of race or nationality or the political or religious views of the writer. There should be the fullest practicable provision of material presenting all points of view concerning the problem and issues of our times...international, national and local; and media or other reading material of sound factual authority should not be proscribed or removed from the library shelves because of partisan or doctrinal disapproval”. The Library does not promulgate particular beliefs or views, nor is the selection of any given media equivalent to endorsement of the viewpoint of the author expressed therein.
- Responsibility for the reading of children rests with their parents or legal guardians. Selection should not be inhibited by the possibility that media may inadvertently come into possession of children.
- Materials with an emphasis on sex, or containing profane language should not be automatically rejected. Selection should be made on the basis of whether the media presents life in its true proportions, whether characters and situations are realistically presented, and whether the media has literary value.

- Based on the services it is expected to perform, it is the responsibility of the Library to provide circulation reference, and research material for the general public and the student. Special collections in depth (business, technology, local history, etc.) shall also be maintained when indicated by accepted Library procedures and budget restraints.

Specific Principles for Selection

The following principles will condition selection:

- Contemporary significance or permanent value.
- Accuracy
- Authority of author
- Relation of work to existing collection
- Price, format and ease of use
- Scarcity of information in subject area
- Availability of material elsewhere in community... holdings of other libraries within the community is considered in developing the Library's collection.
- Popular demand... The Library should make available materials for enlightenment and recreation even if not enduring in value, interest or accuracy. A representative sampling of experimental or short-lived materials may be purchased.

Textbooks

- Providing textbooks and curriculum material is generally held to be the responsibility of the schools. Textbooks should be purchased for the collection when they supply information in areas that may be the best, or the only source of information on the subject.

Non-book Materials

- Purchase of non-book materials should be governed by the same principles and criteria applied to book purchase.

Gifts

- Selection of gifts should be governed by the same principles and criteria applied to the selection of an item for purchase. No conditions may be imposed relating to any gift after its acceptance by the Library

Requests for removal of materials

- The patron's choice of library materials for personal use will be an individual matter.
- Responsibility for the use of materials by children and adolescents shall rest with their parents or legal guardians. While a person may reject materials for himself or herself and for his or her children, he or she shall not exercise censorship to restrict access to the materials by others.

PROPOUNDING PARTY: Plaintiffs Leila Green Little et al.

RESPONDING PARTY: Defendant Bonnie Wallace

SET NUMBER: One (1)

Pursuant to Fed. R. Civ. P. 36, Plaintiffs hereby requests that Defendant Bonnie Wallace (“Defendant” or “Ms. Wallace”) answer the following Requests for Admission and that said answers be served on Plaintiffs at the law offices of BraunHagey & Borden LLP, 351 California Street, 10th Floor, San Francisco, California 94104 or Wittliff Cutter PLLC, 1209 Nueces Street, Austin, Texas 78701, within fourteen (14) days of the Court’s Order re Plaintiffs’ Motion for Expedited Discovery.

These requests are continuing in nature and require supplemental responses as provided by Rule 26 of the Federal Rules of Civil Procedure, in the event counsel for Ms. Wallace, or anyone representing the interests of Ms. Wallace, becomes aware of any additional information, documents, or things sought by these requests between the time Ms. Wallace responds and trial.

DEFINITIONS

1. The term “PLAINTIFFS” refers, collectively and individually, to Leila Green Little, Jeanne Puryear, Kathy Kennedy, Rebecca Jones, Richard Day, Cynthia Waring, and Diane Moster.
2. The terms “YOU” and “YOUR” refer, collectively and individually, to Bonnie Wallace and her officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under her control or on her behalf.
3. The term “DEFENDANTS” refers, collectively and individually, to Llano County, Ron Cunningham, Jerry Don Moss, Peter Jones, Mike Sandoval, Linda Raschke, Amber Milum, Bonnie Wallace, Rochelle Wells, Rhonda Schneider, and Gay Baskin, and their officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under their control or on their behalf.
4. The term “LIBRARY BOARD” refers, collectively and individually to, DEFENDANT Gay Baskin, Susie Sitton, Cindy Travers, Cheryll Mabray, Ravelle Kunderling,

Nancy Miller, Sharon Maki, Louann Raley, DEFENDANT Rochelle Wells, DEFENDANT Rhonda Schneider, Anita Hilton, Robyn Tibbs, and DEFENDANT Bonnie Wallace, and their officers, directors, principals, partners, employees, agents, representatives, consultants, attorneys, and any other persons acting under their control or on their behalf.

5. The term “LIBRARY SYSTEM” refers, collectively and individually, to the Llano Library, the Kingsland Library, and the Lakeshore Library, and their collective and individual collections of physical, audio, and electronic books and materials.

6. The term “OVERDRIVE” refers to the online platform used to access the LIBRARY SYSTEM’s electronic collection or catalog of materials, including ebooks, audio books, movies, and research databases.

7. The term “KRAUSE LIST” refers to the list of purportedly inappropriate books compiled and published by Texas State Representative Matt Krause on October 25, 2021.

8. The term “COLLECTION REVIEW COMMITTEE” refers to the internal committee created by the LIBRARY BOARD for the review of books in the LIBRARY SYSTEM.

9. “SEXUAL CONTENT” refers to any material that refers to, reflects, or depicts sexual activity in any fashion.

10. The term “MATERIALS” refers to physical books, including but not limited to printed books in prose, picture books, and graphic novels and memoirs, as well as digital books, including but not limited to ebooks and audiobooks.

11. The term “INAPPROPRIATE CONTENT” refers to material that DEFENDANTS allege is indecent, pornographic, obscene, or otherwise inappropriate due to profanity or discussion of critical race theory (or “CRT”), gender identity, sex, nudity, sexuality, teen pregnancy, violence, or LGBTQ issues.

12. The term “COMMUNICATIONS” refers to the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) whether orally, in writing, or otherwise, and whether

in the form of emails, messages, text messages, chat logs, letters, envelopes, telegrams, social media posts or direct messages, or otherwise.

13. The term “DOCUMENT” is used in the broadest possible sense, and means, without limitation, any written, printed, typed, photostatic, photographed, recorded or otherwise reproduced COMMUNICATION or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any notes, records, studies, analyses, contracts, agreements, projections, estimates, working papers, summaries, statistical statements, financial statements or work papers, accounts, analytical records, reports or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, or other reports, trade letters, press releases, comparisons, books, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, forecasts, drawings, diagrams, instructions, minutes of meetings, questionnaires, and surveys, charts, graphs, photographs, phonographs, films, videotapes, disks, data cells, drums, printouts and all other data compilations from which information can be obtained, any preliminary versions, drafts, or revisions of any kind of the foregoing, and other writings or documents of whatever description or kind, whether produced or authored by **you** or by anyone else, including non-identical copies of any of the foregoing, now in **your** possession, custody, or control.

14. The term “PERSON” refers to natural persons, corporations, firms, proprietorships, partnerships, trust, joint ventures, groups, associations, institutes, organizations, and any other business, governmental or legal entities, including any divisions, departments, and units thereof.

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By: /DRAFT/
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